

SHEA LAW OFFICES

Mary Shea Hagebols (SBN 113222) shealaw@aol.com
1814 Franklin Street, Suite 800
Oakland, CA 94612
Telephone: 510-208-4422
Facsimile: 415-520-9407

VAN DE POEL, LEVY & ALLEN LLP

Jeffrey W. Allen (SBN 099240) jallen@vanlevylaw.com
Nina Paul (SBN 249954) npaul@vanlevylaw.com
1600 South Main Plaza, Suite 325
Walnut Creek, CA 94596
Telephone: 925-934-6102
Facsimile: 925-934-6060

Attorneys for Plaintiff
JANET HALEY

SEYFARTH SHAW LLP

Francis J. Ortman III (SBN 213202) fortman@seyfarth.com
Matthew J. Mason (SBN 271344) mmason@seyfarth.com
560 Mission Street, 31st Floor
San Francisco, California 94105
Telephone: (415) 397-2823
Facsimile: (415) 397-8549

Attorneys for Defendant
COHEN & STEERS CAPITAL MANAGEMENT, INC.

AKIN GUMP STRAUSS HAUER & FELD LLP

Catherine A. Conway (SBN 98366) cconway@akingump.com
2029 Century Park East, Suite 2400
Los Angeles, California 90067
Telephone: (310) 229-1000
Facsimile: (310) 229-1001

Attorneys for Defendant
DAVID EDLIN

UNITED STATES DISTRICT COURT

IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

OAKLAND

JANET HALEY,)	Case No. C10-03856-PJH
)	
Plaintiff,)	STIPULATION TO ENLARGE TIME
)	FOR THE PARTIES TO FILE
v.)	OPPOSITION AND REPLY BRIEFS
)	FOR PLAINTIFF JANET HALEY'S
COHEN & STEERS CAPITAL)	MOTION FOR LEAVE OF COURT TO
MANAGEMENT, INC., A New York)	TAKE ADDITIONAL DEPOSITION
Corporation Doing Business in California; and)	TESTIMONY FROM TERRANCE

1 DAVID EDLIN, an individual,
 2 Defendants.

) **OBER AND TO TAKE THE**
) **DEPOSITIONS OF MARTIN COHEN,**
) **ROBERT STEERS, FRANK POLI AND**
) **SALVATORE RAPPA**

4
 5 IT IS HEREBY STIPULATED, by and among Plaintiff JANET HALEY ("Plaintiff"),
 6 Defendant COHEN & STEERS CAPITAL MANAGEMENT, INC. ("Cohen & Steers") and
 7 Defendant DAVID EDLIN ("Edlin") (collectively the "Parties"), through their respective
 8 undersigned counsel, as follows:

9 WHEREAS, the Parties have, given the recent non-expert discovery cutoff, engaged in
 10 extensive motion practice in the preceding weeks, including (1) Plaintiff Janet Haley's Motion
 11 for Leave of Court to Take Additional Deposition Testimony from Terrance Ober and to Take
 12 the Depositions of Martin Cohen, Robert Steers, Frank Poli, and Salvatore Rappa ("Motion for
 13 Leave") (filed January 10, 2012, Dkt. No. 141); (2) Plaintiff Janet Haley's Motion for
 14 Administrative Relief for Extension of the Non-Expert Discovery Cutoff for the Limited Purpose
 15 of Completing the Deposition of Terrance Ober and Taking the Depositions of Martin Cohen,
 16 Robert Steers, Frank Poli, and Salvatore Rappa (and associated Oppositions) (Dkt. Nos. 145,
 17 148, 149); (3) Plaintiff's Administrative Motion to File Under Seal (Dkt. No. 150); (4)
 18 Defendants' Motion to Compel Authorization for the Release of Plaintiff's EDD Records (to be
 19 filed on January 20, 2012); (5) Defendants' Motion for Evidentiary and Monetary Sanctions with
 20 Respect to Untimely Rule 26 Disclosures (to be filed on January 20, 2012); and (6) Plaintiff
 21 Janet Haley's Motion to Compel Responses to Requests for Production and Physical Production
 22 of David Edlin's Cellular Telephone (to be filed on January 20, 2012).

23 WHEREAS, Plaintiff's deadline to file her Opposition to Defendant David Edlin's
 24 Motion for Summary Judgment was January 18, 2012 and Edlin's deadline to file his Reply to
 25 Plaintiff's Opposition to Defendant David Edlin's Motion for Summary Judgment is January 25,
 26 2012;

27 WHEREAS, on Thursday, January 19, 2012, the Court entered a Clerk's Notice resetting
 28 the hearing on Plaintiff's Motion for Leave from February 14, 2012 to March 20, 2012;

1 WHEREAS, the Parties are in agreement that all Parties have spent and will continue to
2 spend significant time on the above-mentioned motions and that no party will be prejudiced by
3 an enlargement of time for Defendants to file any Opposition to Plaintiff's Motion for Leave or
4 for Plaintiff to File any Reply to Defendants' Opposition;

5 IT IS HEREBY STIPULATED AND AGREED by and among the Parties, through their
6 respective undersigned counsel, that the filing deadlines for Defendants' Opposition and
7 Plaintiff's Reply shall be extended by two weeks, meaning Defendants' Opposition must be filed
8 on or before Tuesday, February 7, 2012, and Plaintiff's Reply must be filed on or before
9 Tuesday, February 14, 2012.

10
11 IT IS SO STIPULATED.

12 DATED: January 20, 2012

SHEA LAW OFFICES

13 By: /s/ Mary Shea Hagebols
14 Mary Shea Hagebols
15 Attorney for Plaintiff
JANET HALEY

16 DATED: January 20, 2012

VAN DE POEL, LEVY & ALLEN LLP

17 By: /s/ Jeffrey W. Allen
18 Jeffrey W. Allen
19 Attorneys for Plaintiff
JANET HALEY

20 DATED: January 20, 2012

SEYFARTH SHAW LLP

21 By: /s/ Matthew J. Mason
22 Matthew J. Mason
23 Attorneys for Defendant
COHEN & STEERS CAPITAL
MANAGEMENT, INC.

24 DATED: January 20, 2012

AKIN GUMP STRAUSS HAUER & FELD
LLP

25
26 By: /s/ Damien P. Delaney
27 Damien P. Delaney
28 Attorney for Defendant
DAVID EDLIN

~~PROPOSED~~ ORDER

The parties having so stipulated, and GOOD CAUSE APPEARING THEREFORE, IT IS
HEREBY ORDERED that:

The filing deadlines for Defendants' Opposition to Plaintiff Janet Haley's Motion for
Leave of Court to Take Additional Deposition Testimony from Terrance Ober and to Take the
Depositions of Martin Cohen, Robert Steers, Frank Poli, and Salvatore Rappa and Plaintiff's
Reply shall be extended by two weeks, meaning Defendants' Opposition must be filed on or
before Tuesday, February 7, 2012, and Plaintiff's Reply must be filed on or before Tuesday,
February 14, 2012.

IT IS SO ORDERED.

DATED: January 23, 2012


MAGISTRATE JUDGE ELIZABETH D. LAPORTE
UNITED STATES DISTRICT COURT